

United States District Court  
Southern District of New York

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RAFIQ SABIR, PETITIONER

v.

05-cr-673 (LAP)

12-civ-8937 (LAP)

UNITED STATES OF AMERICA,  
RESPONDENT.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 9-29-16

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MOTION FOR SUMMARY JUDGMENTS

In Re.: Outstanding Motions before the District Court.

On 28 July 2016 the District Court ordered the Government to respond to the Outstanding Motions docket nos. 7, 11, 13, 15, 17, 19, 21, 22, 25, within sixty (60) days. Thus far the Government has not responded to any of them. The PETITIONER is vehemently opposed to granting any extensions to the Government on these issues, as these Outstanding Motions had been sent to the Government as much as three years ago, so the Government should have no excuse for not answering within the time allotted by the Court.

Consequently, the PETITIONER asks the Court for summary judgment in his favor on all of these Outstanding motions. As a result of such summary judgment, PETITIONER is entitled to a NEW TRIAL BASED ON NEW EVIDENCE, as claimed in his Rule 33 MOTION FOR A NEW TRIAL BASED ON NEW EVIDENCE.

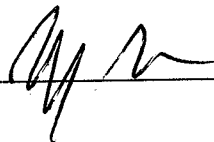
## CERTIFICATE OF SERVICES

I, RAFIQ SABIR, certify under the penalty of perjury pursuant to 28 U.S.C 1746, that a true and correct copy of the foregoing has been placed in the Federal Correctional Institution mailbox in Danbury, Connecticut on this 20 day of September, 20~~12~~<sup>16</sup> in accordance with the prison mailbox rules Houston V. Lack, 487 U.S. \_\_\_\_ 266 (1988), this above styled motion is deemed filed upon placement in the prison mail room and mailed to the following: *Motion For Summary Judgment*

*To: United States Attorney for  
Southern District of New York  
One Saint Andrews Plaza  
New York, New York 10007*

*via First Class Mail.*

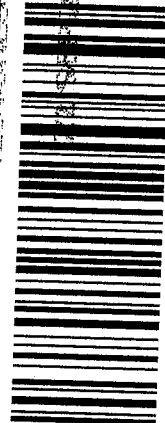
So Served,

  
\_\_\_\_\_

RAPID SABIR #53312066  
 Federal Correctional Institution  
 Route 7  
 Danbury, CT 06811

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